



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Industry Association –	)	
In the Matter of Request for the Allowance	)	RM – 11673
of Optional Electronic Labeling for	)	
Wireless Devices	)	

**INTRODUCTION**

Research In Motion Corporation (“RIM”)<sup>1</sup> is pleased to offer the following comments on the Telecommunications Industry Association’s (“TIA”) petition to the Commission to allow electronic labeling of products.

**DISCUSSION**

The TIA has petitioned the Federal Communications Commission (“FCC”) to allow for the non-exclusive option of electronic labeling. TIA believes that the FCC’s goal of enabling the Commission and consumers to readily determine whether a device has been properly certified and to obtain additional information about a device can be accomplished “more efficiently and effectively by allowing an electronic labeling option for wireless devices.” They point to several factors that have combined to make the FCC’s physical labeling requirement increasingly challenging for smartphone manufacturers, including the growing number of regulators across the globe and the limited amount of space on devices. RIM supports the TIA’s petition and believes that electronic labeling will not only allow consumers to easily access information about each device, but also allow manufacturers to pursue innovative industrial designs.

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<sup>1</sup> RIM, a global leader in wireless innovation, introduced the BlackBerry® solution in 1999. Through the development of integrated hardware, software, and services that support multiple wireless network standards, RIM provides platforms and solutions for seamless access to time-sensitive information including email, phone, SMS messaging, Internet, and intranet-based applications. For more information, please visit [www.rim.com](http://www.rim.com) or [www.blackberry.com](http://www.blackberry.com).



## **RECOMMENDATION**

RIM requests the FCC to allow for the non-exclusive option of electronic labeling as a practical alternative solution to communicate regulatory approvals. The current physical labeling requirement presents numerous challenges to manufacturers who must inscribe many different markings on devices before bringing them to market. This greatly increases costs and decreases efficiency and flexibility in logistics. Manufacturers must continually differentiate and improve products and mandatory regulatory markings limit industrial and aesthetic design options. The challenge is even more pronounced where a manufacturer has a product with an embedded battery and must place the markings on the exterior of the device – effectively changing the contemplated design of the device. Having the additional flexibility to label electronically will thus increase innovation while benefitting the public interest.

Electronic labeling is a natural progression from physical labels. Physical labels provide limited information to consumers with little context while electronic labels could provide valuable information beyond that required by Section 2.925. At a time where technology is rapidly developing and consumers are actively adopting new mobile devices, consumers have become less dependent on receiving information through physical formats and are more savvy and expect important information to be presented in a digital format that is easy to read and more readily accessible.

Several jurisdictions have taken note and have either adopted, or are discussing the adoption of electronic labeling including Australia, Japan, UAE, Costa Rica and the European Union. RIM hopes that the Commission will take this opportunity to reduce technical and logistical burdens on manufacturers and serve as a global leader and model on regulatory labeling.

RIM understands that the Commission is concerned about the visibility of labels at the point of purchase. RIM believes that the FCC could provide a solution to this by allowing for the optional use of a temporary display film on new devices.

## **CONCLUSION**

RIM supports the TIA's petition for rulemaking and urges the Commission to initiate a rulemaking proceeding on this topic. We thank you for this opportunity to comment.



Dated: October 5, 2012

A handwritten signature in black ink that reads 'Clint Robinson'.

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